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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

FEB 02 2006

at 3 o'clock and 40 min. M
SUE BEITIA, CLERK

Attorney for Defendant
LANI ANN BREWER

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00134 SOM
)	
Plaintiff,)	NOTICE OF MOTION; MOTION
)	TO MODIFY CONDITIONS OF
vs.)	RELEASE; CERTIFICATE OF
)	SERVICE
LANI ANN BREWER,)	
)	
)	Date:
Defendant.)	Time:
_____)	Judge:

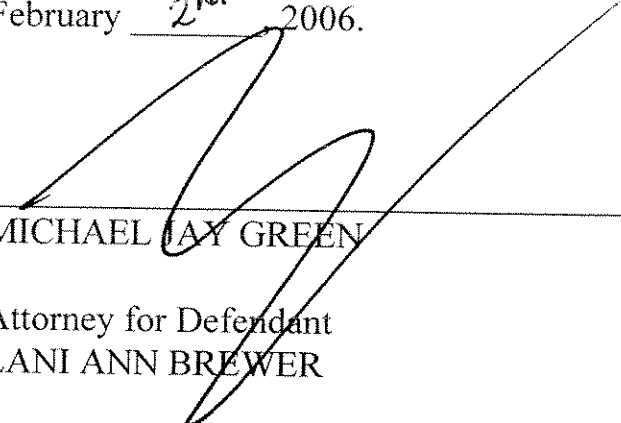
NOTICE OF MOTION

TO: THOMAS MUEHLECK
Assistant U.S. Attorney
Room 6-100, PJKK Federal Bldg.
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Attorney for the Plaintiff

ALISON G.K. THOM
U.S. PRETRIAL SERVICES
300 Ala Moana Boulevard
Honolulu, Hawaii 96850

Please take notice that the foregoing motion will come on for hearing before the Honorable _____, in his/her courtroom in the United States District Court for the District of Hawaii, 300 Ala Moana Blvd., Honolulu, Hawaii, on _____, 2006, at _____ o'clock _____.m, or as soon thereafter as counsel may be heard.

DATED: Honolulu, Hawaii, February 2nd, 2006.



MICHAEL JAY GREEN

Attorney for Defendant
LANI ANN BREWER

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00134 SOM
)	
Plaintiff,)	MOTION TO MODIFY
)	CONDITIONS OF RELEASE
vs.)	
)	
LANI ANN BREWER,)	
)	
Defendant.)	
_____)	

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant LANI ANN BREWER, by and through her attorney, MICHAEL JAY GREEN, hereby moves this Court to modify her conditions of release as follows:

Pursuant to her current conditions of release, defendant Brewer resides at 66-118 Walikanahele Road, Haleiwa, Hawaii, 96712. On January 14, 2006, defendant Brewer was married to Kristopher Robinson. Defendant Brewer respectfully asks this Court to modify her conditions of release so that she be permitted to reside with Mr. Robinson at his residence located at 66-481 Kiloioe Place, Haleiwa, Hawaii 96712, telephone number (808) 222-7321.

In support of this request, defendant Brewer notes as follows:

Defendant Brewer has been under pretrial services supervision since April

6, 2004, without any violations.

While under pretrial services supervision, defendant Brewer has completed intensive outpatient treatment at Hina Mauka. The defendant continues to submit to random drug testing, and all results have been negative.

Defendant Brewer was initially released on the electronic monitoring program under a home detention restriction, with her mother Ann Louise Brewer serving as third party custodian. While under these restrictions, the defendant was fully compliant.

The Court has since removed the home detention, third party custodian, and electronic monitoring conditions. Even with these modifications, the defendant has remained fully compliant with her conditions of release.

There is no reason to believe that Ms. Brewer will not continue to comply with her conditions of release if she is permitted to change her residence.

DATED: Honolulu, Hawaii, February 2nd, 2006.



MICHAEL JAY GREEN

Attorney for Defendant
LANI ANN BREWER

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00134 SOM
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
vs.)	
)	
LANI ANN BREWER,)	
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing document will be duly served by HAND DELIVERY to the parties identified below at their last known address on the date herein indicated.

THOMAS MUEHLECK
Assistant U.S. Attorney
Room 6-100, PJKK Federal Bldg.
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Attorney for the Plaintiff

ALISON G.K. THOM
U.S. PRETRIAL SERVICES
300 Ala Moana Boulevard
Honolulu, Hawaii 96850

DATED: Honolulu, Hawaii, February 2nd, 2006.



MICHAEL JAY GREEN
Attorney for Defendant